

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

DEBRA M. ADAMS, DANILLIE L. )  
MARS, MICHELLE L. MILLER and )  
ANITA W. DAME, individually and on )  
behalf of all others similarly situated, )

*Plaintiffs,* )

v. )

DARTMOUTH-HITCHCOCK CLINIC, )  
THE BOARD OF TRUSTEES OF )  
DARTMOUTH-HITCHCOCK CLINIC, )  
THE ADMINISTRATIVE INVESTMENT )  
OVERSIGHT COMMITTEE OF )  
DARTMOUTH-HITCHCOCK CLINIC and )  
JOHN DOES 1-30. )

*Defendants.* )

**CIVIL ACTION NO.: 22-CV-99-LM**

**JOINT NOTICE OF SETTLEMENT**

Pursuant to Local Rule 41.1, Plaintiffs Debra M. Adams, Danillie L. Mars, and Michelle L. Miller (“Plaintiffs”) and Defendants Dartmouth-Hitchcock Clinic, the Board of Trustees of Dartmouth-Hitchcock Clinic, and the Administrative Investment Oversight Committee of Dartmouth-Hitchcock Clinic (“Defendants”) (collectively, “the Parties”) hereby jointly notify the Court that a class action settlement in principle has been reached by the Parties. The Parties are in the process of preparing a settlement term sheet. The Parties anticipate finalizing a settlement agreement within sixty (60) days of signing the term sheet, after which Plaintiffs will file a motion for preliminary approval of the class action settlement. In light of the agreement to settle this matter, and in the interest of efficiency and preserving judicial resources, the Parties respectfully request that all potential deadlines, hearings, or other dates set by the Court in this matter be suspended pending the forthcoming filing of the motion for preliminary approval of the class action settlement.

Dated: October 31, 2024

By /s/ Mark K. Gyandoh  
Mark K. Gyandoh (admitted *pro hac vice*)  
Jay Wells (admitted *pro hac vice*)  
CAPOZZI ADLER, P.C.  
312 Old Lancaster Road  
Merion Station, PA 19066  
Email: [markg@capozziadler.com](mailto:markg@capozziadler.com)  
[jaw@capozziadler.com](mailto:jaw@capozziadler.com)  
Telephone: (610) 890-0200  
Fax: (717) 233-4103

Peter A. Muhic (admitted *pro hac vice*)  
MUHIC LAW LLC  
923 Haddonfield Road, Suite  
300 Cherry Hill, NJ 08002  
Telephone: (856) 324-8252  
Fax: (717) 233-4103  
Email: [peter@muhiclaw.com](mailto:peter@muhiclaw.com)

*Attorneys for Plaintiffs*

Respectfully submitted,

By: /s/ Nancy G. Ross  
Nancy G. Ross (admitted *pro hac vice*)  
Elaine Liu (admitted *pro hac vice*)  
MAYER BROWN LLP  
71 South Wacker Drive  
Chicago, IL 60606  
(312) 782-0600  
Email: [nross@mayerbrown.com](mailto:nross@mayerbrown.com)  
[eliu@mayerbrown.com](mailto:eliu@mayerbrown.com)

E. Brantley Webb (admitted *pro hac vice*)  
MAYER BROWN LLP  
1999 K Street NW  
Washington, DC 20006  
(202) 263-3000  
Email: [bwebb@mayerbrown.com](mailto:bwebb@mayerbrown.com)

Kathleen M. Mahan (NH #17124)  
HINCKLEY, ALLEN & SNYDER, LLP  
650 Elm Street  
Manchester, NH 01301  
(603) 225-4334  
Email: [kmahan@hinckleyallen.com](mailto:kmahan@hinckleyallen.com)

*Attorneys for Defendants Dartmouth-Hitchcock  
Clinic, Board of Trustees of Dartmouth-Hitchcock  
Clinic, and Administrative Investment Oversight  
Committee of Dartmouth-Hitchcock Clinic*

**CERTIFICATE OF SERVICE**

I hereby certify that, on this date, October 31, 2024, I caused the foregoing to be electronically filed using the CM/ECF system, which will send notification of such filing(s) to all those registered with the ECF system.

/s/ *Elaine Liu*

Elaine Liu